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8 UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13  
14 vs.  
15 DAVID KENNETH HANSEN,  
16 Defendant.

17 Case No.: 2:20-cr-021 TLN

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19 STIPULATION AND ORDER  
20 CONTINUING STATUS CONFERENCE  
21 AND EXCLUDING TIME UNDER THE  
22 SPEEDY TRIAL ACT

23 Date: December 8, 2022  
Time: 9:30 a.m.  
Court: Hon. Troy L. Nunley

24 Plaintiff United States of America by and through Assistant United States Attorney James  
25 Conolly, and Attorney Todd Leras on behalf of Defendant David Hansen, stipulate as follows:

26 1. This matter is presently set for a status conference on December 8, 2022. By this  
stipulation, Defendant Hansen moves to continue the status conference to February 2,  
27 2023.

28 ORDER CONTINUING STATUS  
CONFERENCE

2. This case involves drug trafficking and firearm charges stemming from execution of search warrants in Sacramento and Placer Counties.
3. The government produced supplemental discovery materials in July 2022, including hundreds of hours of video recordings, downloaded onto an external hard drive provided by defense counsel. These video recordings are so voluminous that they required computer storage space estimated to be more than two terabytes. These recordings also contain information regarding potential defense investigation related to sentence mitigation. Defense counsel is continuing to review these materials with Mr. Hansen at the Sacramento County Main Jail. The parties are also engaged in discussions regarding settlement of this matter.
4. The defense is conducting investigation based on the supplemental discovery provided by the government. In addition, defense counsel is discussing proposed settlement with Mr. Hansen. The defense therefore requests additional time to complete its investigation.
5. Given the ongoing defense investigation, Defendant Hansen requests to continue the status conference in this matter to February 2, 2023, at 9:30 a.m., and to exclude time between December 8, 2022, and February 2, 2023, inclusive, under Local Code T-4. The United States does not oppose this request.
6. Attorney Todd Leras represents and believes that failure to grant additional time as requested would deny Defendant Hansen the reasonable time necessary for effective preparation, considering the exercise of due diligence.
7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et*

ORDER CONTINUING STATUS  
CONFERENCE

1       seq., within which trial must commence, the time period of December 8, 2022 to  
2       February 2, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §  
3       3161(h)(7)(A), and (B) (iv) [Local Code T-4] because it results from a continuance  
4       granted by the Court at Defendant Hansen's request on the basis that the ends of  
5       justice served by taking such action outweigh the best interest of the public and the  
6       Defendant in a speedy trial.

8       8. Nothing in this stipulation and order shall preclude a finding that other provisions of  
9       the Speedy Trial Act dictate that additional time periods are excludable from the  
10       period within which a trial must commence.

12       Assistant U.S. Attorney James Conolly has reviewed this proposed order and authorized  
13       Todd Leras via email to sign it on his behalf.

14       DATED: December 6, 2022

PHILLIP A. TALBERT  
United States Attorney

16       By /s/ Todd D. Leras for  
17       JAMES CONOLLY  
18       Assistant United States Attorney

19       DATED: December 6, 2022

19       By /s/ Todd D. Leras  
20       TODD D. LERAS  
21       Attorney for Defendant  
22       DAVID HANSEN

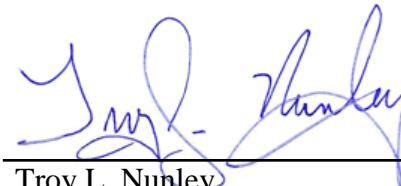
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28       ORDER CONTINUING STATUS  
          CONFERENCE

1 **ORDER**  
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3       BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is  
4 hereby ordered that the status conference in this matter, scheduled for December 8, 2022, is  
5 vacated. A new status conference is scheduled for February 2, 2023, at 9:30 a.m. The Court  
6 further finds, based on the representations of the parties and Defendant Hansen's request, that the  
7 ends of justice served by granting the continuance outweigh the best interests of the public and  
8 the Defendant in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. §  
9 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into  
10 consideration the exercise of due diligence for the period from December 8, 2022, up to and  
11 including February 2, 2023.

13       IT IS SO ORDERED.

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15       DATED: December 6, 2022



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17       Troy L. Nunley  
18       United States District Judge

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28       ORDER CONTINUING STATUS  
          CONFERENCE